

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael J. Costello, Special Agent of the Social Security Administration Office of the Inspector General (“SSA-OIG”), being first duly sworn, hereby depose and state as follows:

INTRODUCTION

1. I make this affidavit in support of a criminal complaint and arrest warrant for Anthony D. Wilson. Based upon the following information, I believe there is probable cause that Wilson violated 18 U.S.C. § 115(a)(1)(B) by threatening to execute, shoot, burn, and hang a Social Security Administration (“SSA”) contractor and employees of the SSA field office in Warren, Ohio with the intent to impede, intimidate, or interfere with such employees while engaged in the performance of their official duties.

2. This affidavit is made based upon my own personal knowledge and is derived from credible law enforcement sources. This affidavit is intended to show only that there is sufficient probable cause for the requested complaint and arrest warrant and does not set forth all of my knowledge about this matter.

TRAINING AND EXPERIENCE

3. I have been a Special Agent with the SSA-OIG since September 2019. I hold a Master of Science in Leadership degree from Northeastern University and a Bachelor of Arts degree with a major in Sociology from John Carroll University. I graduated from the Federal Law Enforcement Training Center after successfully completing the thirteen-week Criminal Investigator Training Program. Prior to my tenure as a Special Agent, I served in various

operations positions with the SSA including Claims Specialist, Technical Expert, and Operations Supervisor. I also served in the U.S. Army as a Cavalry Officer.

4. As a Special Agent, I have conducted numerous investigations involving Social Security Fraud and other federal offenses, including but not limited to 18 U.S.C. § 115(a)(1)(B) (Threatening a Federal Employee).

PROBABLE CAUSE

5. In March 2021 and before, the SSA paid Wilson Supplemental Security Income (SSI) benefits because he was a disabled individual with limited financial resources. In January 2020, the SSA commenced a review of Wilson's disability to ensure he remained eligible to receive these benefits. This review required Wilson to undergo medical examinations to confirm his disabled status.

6. At the conclusion of this review the SSA determined that Wilson was not disabled and discontinued his benefits in November 2020. In January 2021, Wilson appealed this decision and requested to have his SSI benefits continued. In order to consider his appeal, the SSA required Wilson to undergo additional medical examinations to confirm his disability. B [REDACTED] S [REDACTED], a claims adjudicator with the Opportunities for Ohioans with Disabilities, Disability Determination Services ("OOD-DDS") located in Columbus, Ohio performed the review for the SSA and was responsible for coordinating Wilson's medical examinations. OOD-DDS is an Ohio state agency that contracts with the SSA to make eligibility determinations for the benefit programs administered by the SSA. In examination appointment letters S [REDACTED] sent to Wilson, she informed Wilson that her agency performed the disability reviews for the SSA.

7. On Friday, March 19, 2021, Wilson spoke to S [REDACTED] after calling her direct phone number. This number was listed on Wilson's examination appointment letters. During that conversation, Wilson stated that he was unable to make a previously scheduled examination appointment, he was moving to Pennsylvania, and he did not want to see an examiner in Ohio. At the end of the day, S [REDACTED] powered off her SSA-issued cell phone and did not power it back on until she returned to work the following Monday.

8. On Monday, March 22, 2021, S [REDACTED] checked her voicemail and discovered fifteen total voicemails that Wilson left for her over the weekend. After reviewing the contents of these messages, I determined that six of these voicemails contained threatening remarks aimed toward S [REDACTED] and SSA employees. In her voicemail greeting, S [REDACTED] identified herself as an employee of OOD-DDS.

9. The threatening messages over the two-day period were as follows:

- a. "Hello, yesterday I told you I was moving. Today strange things happened. One of you f-----g retard motherf-----s in this office gives out my personal information again—they will find you in a f-----g dumpster burning! Am I f-----g understood? I am leaving the area and I'm filing lawsuits over the f-----g childish, ignorant s--t you scumbag motherf-----s are doing. I'm suing the city. I'm suing each f-----g employee that has something to do with this for the past seven years. You f-----g bother me again, you are f-----g dead! I will handle my business elsewhere. Go f--k yourself you piece of s--t!"

- b. “After I prove I was misdiagnosed due to negligence and unprofessional conduct and corruption in the area, I plan on running for president, and people like you, I am going to drag out into the street and f-----g execute on the news.”
- c. “I am taking my case elsewhere. Do not harass me again. Do not bother me again. Why did you feel the need to push where I was going out of me? You f-----g bother me again, I’ll come put a f-----g bullet in you! You harass me or my family again, I will f-----g come put a bullet in you! Do not f-----g bother me again. I s--t you people the f--k not, I am going to come down on you motherf-----s like Hell its f-----g self! Am I understood? I am going to drag you people out and f-----g hang you after I try you.”
- d. “Monday I will be in contact with another office because I am moving and leaving this area. You people don’t run s--t. You people aren’t stopping s--t and I hope I am f-----g understood. All the f-----g little idiots from around this area that done the bull s--t they’ve done in the past year or more—it’s going to cost and it’s going to cost deeply! Any of you bother or harass me again knowing I am leaving the area, I will f-----g defend myself—lethally. Any of you bother me again, it’s f-----g over!”
- e. “I am taking my business elsewhere, let this echo around the downtown Warren watercooler. You f--k with me you are f-----g dead. I will drag you people into the street and f-----g execute you.”

- f. “One f-----g problem after I move, I will turn the car around and come to that office with a mother f-----g rifle!”

10. S [REDACTED] received these threatening voicemails while on duty performing her job responsibilities for the SSA. These voicemails left her feeling intimidated, caused her to use official time to report the receipt of these messages to me, and prevented her from completing other official tasks related to her job.

11. Wilson did not identify himself or provide his phone number in the voice mail messages I reviewed. S [REDACTED] explained to me that the phone number associated with the threatening voicemails, 330-240-4830, appeared in her call log and that she recognized Wilson’s voice from their conversation on March 19, 2021 and previous phone conversations. S [REDACTED] further explained that the phone number that appeared in her call log matched Wilson’s phone number in her agency’s computer system. I reviewed records maintained by the Social Security Administration associated with his Supplemental Security Income case and this phone number also matches the agency’s records for Wilson. I also searched Accurint, a database for law enforcement that provides information for criminal investigations, for the phone number used by Wilson and discovered the phone number is associated with a wireless account belonging to Christine Patterson, Wilson’s wife.

12. On March 30, 2021, I and other federal agents attempted to interview Wilson at his place of residence located at 831 Greenlawn Ave NW, Apt 5, Warren, Ohio 44483. Upon arrival at the residence, we attempted to gain access to the entryway of the apartment building, but the door was locked. As we attempted access to the entryway, an individual inside a ground-

level apartment opened a window, at which point we identified Wilson in the apartment. We identified the person in the apartment as Wilson by comparing his facial features to a previously obtained photograph of Wilson we received from the Ohio Bureau of Motor Vehicles. At that time, we introduced ourselves and he confirmed he was in fact, Anthony Wilson. We requested that he open the door to the entryway of the apartment building to which he refused. We then contacted the property manager of the apartment complex who provided us access into the entryway. After entering the building, we knocked on the door, introduced ourselves, and requested that Wilson exit the residence in order to answer questions related to the threatening voicemails. Wilson stated, "I could be standing here with a shotgun talking to you, understand?" and refused to open his apartment door and exit the residence. As our interactions progressed, Wilson became more agitated, aggressive, and his voice continued to escalate. As we attempted to leave the entryway and the apartment building, Wilson returned to the open window and continued to communicate with us through the open window. When asked about his interactions with the SSA, Wilson mentioned his prior interactions with S [REDACTED] and stated that he felt he was being harassed by the agency. He specifically mentioned the "office in town," which we believed him to mean the Warren, Ohio SSA field office. Eventually, Wilson backed away from the window and no further attempts to interview him were performed.

13. As part of the investigation, I obtained a copy of Wilson's criminal history and discovered a number of prior arrests for making threatening statements. In June 2018 and in April 2020, state law enforcement officers in Ohio arrested Wilson for Menacing, a fourth degree misdemeanor, for making threatening statements. Wilson pleaded guilty to the lesser offense of Disorderly Conduct in both cases. I also obtained a police report from the Bazetta Township

Police Department that described a March 4, 2021 incident in which Wilson appeared at the police station and threatened to “end up killing a cop.” State law enforcement officers arrested Wilson on that date and charged him with Aggravated Menacing, a fifth degree felony and Inducing Panic, a first degree misdemeanor. The local court released Wilson on bond as this case remains pending disposition.

CONCLUSION

14. Based on the foregoing information, probable cause exists that Wilson threatened to kill employees of the SSA’s field office in Warren, Ohio with the intent to impede, intimidate, and interfere with such employees while engaged in the performance of their official duties in violation of Title 18, United States Code, 115(a)(2)(B).

Respectfully submitted,



Michael J. Costello
Special Agent
Office of the Inspector General
Social Security Administration

Sworn to via telephone after submission by reliable electronic means. Fed. R. Crim. P. 3, 4(d), and 4.1, on this 31st, day of March, 2021 in Youngstown, Ohio.



Carmen E. Henderson
United States Magistrate Judge